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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE GUADALUPE LOPEZ-ZAMORA,
LEONARDO FLORES BELTRAN,
CHRISTIAN ANTHONY ROMERO,
JOAQUIN ALBERTO SOTELO VALDEZ,
ERIKA GABRIELA ZAMORA ROJO,
JOSE LUIS AGUILAR SAUCEDO, and
ROSARIO ZAMORA ROJO,

Defendants.

CASE NO. 2:21-CR-0007-DAD

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
[PROPOSED] ORDER

DATE: December 13, 2022

TIME: 9:30 a.m.

COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and the above-captioned defendants, by and through their respective counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on December 13, 2022.
2. By this stipulation, defendants now move to continue the status conference until March 28, 2023, and to exclude time between December 13, 2022, and March 28, 2023, under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:

1 a) The grand jury returned an indictment in this case on January 28, 2021. Fourteen
2 defendants are named in the publicly filed indictment. The names of two additional defendants
3 who have not yet been arrested are redacted from the publicly filed indictment.

4 b) On May 11, 2021, the Court signed an order substituting attorney Kresta Daly as
5 counsel of record for defendant Christian Romero. ECF No. 162.

6 c) On January 4, 2022, defendant Rosario Zamora Rojo made his initial appearance
7 on a criminal complaint. *See* 2:21-MJ-00153-DB, ECF No. 5.

8 d) On March 3, 2022, the grand jury returned a superseding indictment adding
9 Rosario Zamora Rojo as a defendant and adding a money-laundering conspiracy charge against
10 defendants Jose Lopez-Zamora and Erika Zamora Rojo. ECF No. 276.

11 e) On December 5, 2022, the Court signed an order substituting attorney Jennifer
12 Mouzis as new counsel of record for defendant Erika Gabriela Zamora Rojo, in place of attorney
13 Martin Tejeda. ECF No. 408.

14 f) The government has represented that the discovery associated with this case to
15 date includes approximately 8,252 pages of materials, including investigative reports,
16 photographs, search warrant materials, and other documents, as well as voluminous audio and
17 video recordings and approximately 978 recorded phone calls intercepted pursuant to the Title III
18 wiretap in this case. All of this discovery has been either produced directly to counsel and/or
19 made available for inspection and copying.

20 g) Counsel for defendants need additional time to review the voluminous discovery
21 in this case, to conduct independent factual investigation, to research trial and sentencing issues,
22 to consult with their clients, and to otherwise prepare for trial. In particular, attorney Jennifer
23 Mouzis, who was substituted as new counsel of record for defendant Erika Gabriela Zamora
24 Rojo on December 5, 2022, needs time to review the voluminous discovery in this case, consult
25 with her client, and otherwise prepare for trial.

26 h) Counsel for defendants believe that failure to grant the above-requested
27 continuance would deny them the reasonable time necessary for effective preparation, taking into
28 account the exercise of due diligence.

1 i) The government does not object to the continuance.

2 j) In addition, this case is “complex” within the meaning of 18 U.S.C.
3 § 3161(h)(7)(A), B(ii) [Local Code T2], as this Court previously found in its February 10, 2021
4 Order (ECF No. 103) and subsequent orders.

5 k) Based on the above-stated findings, the ends of justice served by continuing the
6 case as requested outweigh the interest of the public and the defendant in a trial within the
7 original date prescribed by the Speedy Trial Act.

8 l) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
9 et seq., within which trial must commence, the time period of December 13, 2022 to March 28,
10 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
11 T4] and 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T2] because it results from a continuance
12 granted by the Court at defendant’s request on the basis of the Court’s finding that the ends of
13 justice served by taking such action outweigh the best interest of the public and the defendant in
14 a speedy trial.

15 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
16 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
17 must commence.

18 IT IS SO STIPULATED.
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1 Dated: December 6, 2022

PHILLIP A. TALBERT
United States Attorney

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3 /s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

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5 Dated: December 6, 2022

/s/ Todd D. Leras
Todd D. Leras
Counsel for Defendant
JOSE GUADALUPE LOPEZ-
ZAMORA

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8 Dated: December 6, 2022

/s/ Christopher R. Cosca
Christopher R. Cosca
Counsel for Defendant
LEONARDO FLORES BELTRAN

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10
11 Dated: December 6, 2022

/s/ Kresta N. Daly
Kresta N. Daly
Counsel for Defendant
CHRISTIAN ANTHONY ROMERO

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14 Dated: December 6, 2022

/s/ Michael D. Long
Michael D. Long
Counsel for Defendant
JOAQUIN ALBERTO SOTELO
VALDEZ

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18 Dated: December 6, 2022

/s/ Jennifer Mouzis
Jennifer Mouzis
Counsel for Defendant
ERIKA GABRIELA ZAMORA ROJO

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20
21 Dated: December 6, 2022

/s/ Dina L. Santos
Dina L. Santos
Counsel for Defendant
JOSE LUIS AGUILAR SAUCEDO

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23
24 Dated: December 6, 2022

/s/ Shari Rusk
Shari Rusk
Counsel for Defendant
ROSARIO ZAMORA ROJO

[PROPOSED] FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this ____ day of _____, ____.

THE HONORABLE DALE A. DROZD
UNITED STATES DISTRICT JUDGE